

### **REMARKS**

Claims 1, 3-20 and 22 are pending in the case. The Examiner's reconsideration of the rejections is respectfully requested in view of the remarks.

Claims 1, 3-20 and 22 have been rejected under 35 USC 102(e) as being anticipated by Liou et al. (U.S. Patent Application No. 2002/0059395). The Examiner stated essentially that Liou teaches all the limitations of Claims 1, 3-20 and 22.

Applicants note that the Examiner has relied on the figures of Liou to support the rejections. However, several figures relied on are not found in Liou's provisional application. Applicants further note that the non-provisional application of Liou does not pre-date the present application (filing date of July 19, 2001 for Liou versus March 14, 2001 for the present invention), and that only the provisional application of Liou has a filing date earlier than the provisional application relied on by the present application. Thus, Applicants request that the Examiner point to the teachings of Liou's provisional application to support the rejections.

Turning now to the merits of the rejection: Claim 1 claims, *inter alia*, "displaying an activity map comprising at least two perspectives of the environment, wherein each perspective is an abstract graphical display of at least one aspect of the user activity within the environment;... and displaying a tangible link representing an association between the element of the first perspective and at least one element of a second perspective, wherein each element of the second perspective is an abstract graphical display of a corresponding predefined characteristic of the user activity within the environment." Claim 12 claims, "representing the

aspect in an activity map including at least two perspectives of the aspect; representing an activity of a user within the environment, wherein the activity corresponds to the aspect and is represented in each perspective simultaneously; and representing the activity of the user as a tangible link between each perspective of the aspect.” Claim 19 claims, *inter alia*, “displaying at least one different aspect of user activity in each of at least two perspectives of an activity map, wherein the perspectives are associated by the user activity of a market participant, wherein an association between perspectives is represented as a tangible link connecting perspectives, wherein the tangible link is a line linking aspects of the user activity of the market participant represented separately in the at least two associated perspectives of the activity map.”

Referring to Claim 1: Liou teaches method for providing a user interface for product exploration and product configuration (see Abstract). Liou does not teach “displaying an activity map comprising at least two perspectives of the environment, wherein each perspective is an abstract graphical display of at least one aspect of the user activity within the environment” as claimed in Claim 1. Liou teaches a literal view of product information (see for example, FIG 1). Liou’s literal view of product information is neither an abstract view nor a view of user activity within an environment. Thus Liou fails to teach an “abstract graphical display of at least one aspect of the user activity within the environment” as claimed in Claim 1.

Further, nowhere does Liou teach “displaying a tangible link representing an association between the element of the first perspective and at least one element of a second perspective” as claimed in Claim 1. Liou merely teaches tabs for switching between views of product information, wherein the view are “unique and independent” (see paragraph [0035]). The user interface and tabs of Liou fail to display two perspectives - a tab is clearly not a perspective but merely an object or tool used to switch between the unique and independent views (see

paragraph [0035]). Further, the tabs fail to impart any information associating elements in two perspectives, essentially as claimed in Claim 1. Therefore, Liou fails to teach all the limitations of Claim 1.

Referring to Claim 12: Liou teaches method for providing a user interface for product exploration and product configuration (see Abstract). Liou does not teach “representing the aspect in an activity map including at least two perspectives of the aspect; representing an activity of a user within the environment, wherein the activity corresponds to the aspect and is represented in each perspective simultaneously; and representing the activity of the user as a tangible link between each perspective of the aspect” as claimed in Claim 12. Liou teaches a literal view of product information (see for example, FIG 1). Liou’s literal view of product information is not “an activity map including at least two perspectives of the aspect.” For example, Liou teaches the use of tabs to switch between individual views - no more than one window corresponding to a selected tab is displayed at any time. Further, the tabs clearly do not represent “the activity of the user as a tangible link between each perspective of the aspect” as claimed in Claim 12. Tabs reveal product information and are unrelated to displaying the activity of a user. Therefore, Liou fails to teach all the limitations of Claim 12.

Referring to Claim 19: Liou teaches method for providing a user interface for product exploration and product configuration (see Abstract). Liou does not teach “displaying at least one different aspect of user activity in each of at least two perspectives of an activity map, wherein the perspectives are associated by the user activity of a market participant, wherein an association between perspectives is represented as a tangible link connecting perspectives, wherein the tangible link is a line linking aspects of the user activity of the market participant represented separately in the at least two associated perspectives of the activity map” as claimed

in Claim 19. Liou teaches a literal view of product information (see for example, FIG 1). Liou's literal view of product information does not display a “tangible link is a line linking aspects of the user activity of the market participant represented separately in the at least two associated perspectives of the activity map” as claimed in Claim 19. Nowhere does Liou teach a line between perspectives. Therefore, Liou fails to teach all the limitations of Claim 19.

Claims 3-11 depend from Claim 1. Claims 13-18 depend from Claim 12. Claims 20 and 22 dependent The dependent claims are believed to be allowable for at least the reasons given for the respective independent claims.

The Examiner's reconsideration of the rejection is respectfully requested.

For the forgoing reasons, the present application, including claims 1, 3-20 and 22, is believed to be in condition for allowance. The Examiner's early and favorable action is respectfully urged.

Respectfully submitted,

Dated: June 11, 2007

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